

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION  
CLEVELAND, OHIO

MASSIMO LA ROSA,	)	CASE NO. 1:18-CV-00095
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
v.	)	MAGISTRATE JUDGE THOMAS M.
	)	PARKER
JONATHAN ALLEN, et al.,	)	
	)	<b><u>DEFENDANT ABBIE CONANT'S</u></b>
Defendants.	)	<b><u>UNOPPOSED MOTION FOR AN</u></b>
	)	<b><u>EXTENSION OF TIME TO RESPOND</u></b>
	)	<b><u>TO PLAINTIFF'S COMPLAINT</u></b>
	)	

Defendant Abbie Conant respectfully moves this Court for a 14-day extension of time, up to and including February 2, 2018, in which to answer or otherwise respond to Plaintiff Massimo La Rosa's Complaint.

Ms. Conant removed this case to this Court on January 12, 2018. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), Ms. Conant must answer or otherwise respond to the Complaint by January 19, 2018. Ms. Conant respectfully requests additional time to investigate and respond to the pleading. No prior extensions have been requested or granted, and this request is not made for purposes of delay.

Plaintiff's counsel has advised Ms. Conant that Plaintiff does not object to Ms. Conant's request for additional time to respond to the Complaint.

For the foregoing reasons, Ms. Conant respectfully requests an extension of time, up to and including February 2, 2018, in which to answer or otherwise respond to Plaintiff's Complaint. A proposed order is attached for the Court's convenience.

Respectfully submitted,

/s/ Steven S. Kaufman

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically on January 17, 2018.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.  
Parties may access this filing through the Court's system.

/s/ Steven S. Kaufman  
Steven S. Kaufman  
*One of the Attorneys for Defendant Abbie  
Conant*